REMARKS/ARGUMENTS

Claims 1-8, 10-25, and 27-38 are pending in the application. Claims 1-8, 10-25, and 27-38 stand rejected as obvious under 35 U.S.C. 103(a).

Claim Amendments

In response to the Examiner's remarks concerning "additionally receiving", the foregoing amendment of claims 1, 18, and 35 clarifies "receiving a request for a startup of at least one transaction terminal process by a process controller of the transaction terminal selected from a group of transaction terminal processes ..., in addition to screen reader and audio processes...." See, e.g., Specification, p. 5, line 10-p. 6, line 2.

The amendment of Claims 1, 18, and 35 also clarifies "performing screen reader and audio application functions by the screen reader and audio processes consisting at least in part of reading text that is presented on a screen of the transaction terminal and converting the text to audible speech and diverting the audible speech to a headphone for a visually impaired user, while eliminating audio via external speaker at the transaction terminal until one of completion and timing out of a session of the visually impaired user, and providing a screen layout with navigation selections exclusively by touchscreen for the visually impaired user." See, e.g., Specification, p. 10, line 23-p. 11, line 32; p. 12, lines 1-15; and p. 16 line13-p. 17, line19.

Support for the foregoing amendment is found throughout the specification and in the claims as detailed above. Accordingly, no new matter has been added.

Claim Rejections - 35 U.S.C. § 103

Claims 1-8, 10-25, and 27-38 stand rejected as unpatentable over Zeanah (U.S. 5,933,816) in view of Sears (U.S. 6,115,482) and apparently in view of Blumstein (U.S. 5,589,855) (See parenthetical on p. 4 of the Office Action dated 9/24/04). The rejection is respectfully traversed and reconsideration is requested.

There is no motivation to modify Zeanah in view of Sears and/or Blumstein, and the proposed modification lacks one or more limitations recited in each of independent claims 1, 18, and 35 in at least the following respects:

- Zeanah fails to teach or suggest anything about screen reader technology in general and in particular fails to teach or suggest, "performing screen reader and audio application functions by the screen reader and audio processes consisting at least in part of reading text that is presented on a screen of the transaction terminal and converting the text to audible speech and diverting the audible speech to a headphone for a visually impaired user, while eliminating audio via external speaker at the transaction terminal until one of completion and timing out of a session of the visually impaired user" as recited in amended independent claims 1, 18, and 35. On the contrary, Zeanah teaches a standard ATM user interface for a fully sighted user that displays and collects user information on a welcome page for the sighted user (See, e.g., Zeanah, Col 11, lines 38-40), displays mini-apps available to the sighted user in a frame space of the navigation shell (See, e.g., Zeanah, Col 12, lines 41-58), and displays mini-app dialog pages for the sighted user's input (See, e.g., Zeanah, Col 12, lines 13-63).

- Sears is devoid of any teaching or suggestion of "reading text that is presented on a screen of the transaction terminal and converting the text to audible speech and diverting the audible speech to a headphone for a visually impaired user, while eliminating audio via external speaker at the transaction terminal until one of completion and timing out of a session of the visually impaired user" as recited in amended independent claims 1, 18, and 35. Instead, Sears teaches a reading system in which cameras capture an image of text along with the user's input in the form of images of the user's hand and finger movements and which then converts the text to speech in accordance with the user's hand and finger movement input. See, e.g., Sears, Col 6, line 52-Col 8, line 25.

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- Blumstein likewise fails to teach or suggest anything about screen reader technology in general and in particular fails to teach or suggest, "performing screen reader and audio application functions by the screen reader and audio processes consisting at least in part of <u>reading text that is presented on a screen of the transaction terminal and</u> converting <u>the</u> text to audible speech and diverting the audible speech to a headphone for a visually impaired user, while eliminating audio via external speaker at the transaction terminal <u>until one of completion and timing out of a session of the visually impaired user</u>" as recited in amended independent claims 1, 18, and 35. On the contrary, Blumstein teaches an ATM that allows a visually impaired user to enter numbers by touching certain quadrants of the touchscreen a certain number of times and which provides audio feedback to the user via a scripted menu broadcast over a built-in loudspeaker (<u>See</u>, e.g. Blumstein, Col 2, lines 5-36), which as pointed out in the present application, seriously compromises the security and privacy of visually impaired users by broadcasting the scripted prompts that are audible to passers-by.

Consequently, Zeanah, Sears, and/or Blumstein, separately or in combination with one another, do not recite the required combination of limitations of amended independent claims 1, 18, and 35, that propose, e.g., "performing screen reader and audio application functions by the screen reader and audio processes consisting at least in part of <u>reading text that is presented on a screen of the transaction terminal and</u> converting <u>the</u> text to audible speech and diverting the audible speech to a headphone for a visually impaired user, while eliminating audio via external speaker at the transaction terminal <u>until one of completion and timing out of a session of the visually impaired user</u>, and providing a screen layout with navigation selections exclusively by touchscreen for the visually impaired user"

Because each and every element as set forth in amended independent claims 1, 18, and 35 is not found, either expressly or inherently in Zeanah, Sears, and/or Blumstein, the Examiner has failed to establish the required *prima facie* case of
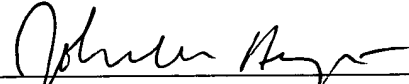
unpatentability. See Verdegaal Bros. v. Union Oil Co. of California, 814 F.2d 628 (Fed. Cir. 1987); See also MPEP §2131. The Examiner has failed to establish the required *prima facie* case of unpatentability for independent claims 1, 18, and 35, and similarly has failed to establish a *prima facie* case of unpatentability for claims 2-8 and 10-17 that depend on claim 1, claims 19-25 and 27-34 that depend on claim 18, and claims 36-38 that depend on claim 35 and which recite further specific elements that have no reasonable correspondence with the references.

Conclusion

In view of the foregoing amendment and these remarks, each of the claims remaining in the application is in condition for immediate allowance. Accordingly, the examiner is requested to reconsider and withdraw the rejection and to pass the application to issue. The examiner is respectfully invited to telephone the undersigned at (336) 607-7318 to discuss any questions relating to the application.

Respectfully submitted,

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